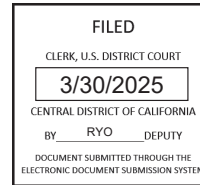


Arjun Vasan  
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Plaintiff in Pro Per



**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**Arjun Vasan,**  
Plaintiff,  
  
vs.  
**Checkmate.com, Inc.,**  
(dba "Checkmate"),  
Defendant.

Case No.: 2:25-cv-00765-MEMF-JPR

**NOTICE OF DEFENDANT'S  
INCOMPLETE DISCLOSURE OF  
INTERESTED PARTIES**

**I. INTRODUCTION**

Defendant Checkmate.com, Inc. ("Defendant") has filed a Corporate Disclosure Statement that fails to disclose Tiger Global as an interested party, despite Tiger Global's substantial ownership stake in Defendant and direct pecuniary interest in the outcome of this case. This omission appears to violate Local Rule 7.1.1.

**II. UNDISCLOSED INTERESTED PARTY**

Tiger Global Private Investment Partners X, LP ("Tiger Global") is a significant interested party in this litigation for the following reasons:

- 1 1. Tiger Global has a substantial ownership stake in Defendant
- 2 Checkmate.com, Inc., as evidenced by their role as the lead investor in
- 3 multiple financing rounds, including Defendant's seed round, Series A, and
- 4 most recently, the Series B round (see Exhibits B and C).
- 5 2. At least one Tiger Global representative, Partner Griffin Schroeder, serves
- 6 on Defendant's Board of Directors.
- 7 3. Tiger Global's approval was required to close the merger between VoiceBite
- 8 Corporation and Defendant—the transaction at the heart of this litigation.
- 9 4. Tiger Global was the sole investor in Defendant's recent \$10 million Series
- 10 B funding round (see Exhibit C), which is directly relevant to Plaintiff's
- 11 claims regarding unpaid bonuses tied to this financing.
- 12 5. Upon information and belief, Tiger Global participated in decisions
- 13 regarding late introduced merger documents described in Plaintiff's
- 14 Complaint (¶¶ 16-19), which are central to the claims in this litigation
- 15 6. Upon information and belief, Tiger Global participated in decisions
- 16 regarding the financing structure that Defendant has cited as justification for
- 17 withholding contractually guaranteed payments to Plaintiff.
- 18

### 19 **III. INCONSISTENT DISCLOSURE IN OTHER LITIGATION**

20 Notably, Defendant has disclosed Tiger Global as an interested party in other  
21 federal litigation. In *Thiele v. Checkmate.com, Inc.*, Case No. 5:24-cv-00337-TES  
22 (M.D. Ga.), Defendant's Certificate of Interested Persons and Corporate Disclosure  
23 Statement filed on November 20, 2024, explicitly states:

24 "Tiger Global Private Investment Partners X, LP, is a private equity fund that  
25 owns more than 10% of Checkmate.com, Inc.'s stock." (Exhibit A)  
26  
27  
28

1 This inconsistency between disclosures in different federal courts suggests that  
2 Defendant's failure to disclose Tiger Global in this action was not the result of  
3 oversight, but rather a deliberate omission.

#### 4 5 **IV. LOCAL RULE 7.1.1 REQUIREMENTS**

6 Local Rule 7.1.1 of the Central District of California requires parties to disclose  
7 "all persons, associations of persons, firms, partnerships, corporations (including  
8 parent corporations) or other entities that have a direct or indirect pecuniary  
9 interest in the outcome of the case." This requirement is broader than Federal Rule  
10 of Civil Procedure 7.1 and clearly encompasses Tiger Global given its substantial  
11 ownership stake, board membership and direct financial interest in Defendant.

#### 12 13 **V. RELEVANCE TO PROCEEDINGS**

14 The non-disclosure of Tiger Global as an interested party is significant because:

- 15 1. It prevents the Court from fully understanding the relationships between the  
16 parties and potential conflicts of interest.
- 17 2. It obscures potentially relevant information regarding the decision-making  
18 process behind actions central to Plaintiff's claims.
- 19 3. It may hamper Plaintiff's ability to conduct appropriate discovery regarding  
20 all parties with potential liability.
- 21 4. The inconsistent disclosure across federal courts raises concerns about  
22 Defendant's candor with this Court.

23 Plaintiff brings this matter to the Court's attention not to seek immediate relief but  
24 to ensure a complete and accurate record as this litigation proceeds.

#### 25 26 **VI. EXHIBITS**

27 Attached to this Notice are the following exhibits:  
28

1 **Exhibit A:** Defendant's Certificate of Interested Persons and Corporate Disclosure  
2 Statement filed in Thiele v. Checkmate.com, Inc., Case No. 5:24-cv-00337-TES  
3 (M.D. Ga.) on November 20, 2024.

4  
5 **Exhibit B:** Press release regarding Defendant's Series A financing, showing Tiger  
6 Global as lead investor.

7  
8 **Exhibit C:** Press release dated October 23, 2024, regarding Defendant's \$10  
9 million Series B financing, showing Tiger Global as sole investor.

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19  
20 DATED: March 30, 2025

21  
22 Respectfully submitted,

23  
24  
25  
26 

27 ARJUN VASAN

28 Plaintiff in Pro Per

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

JAMES THIELE,

Plaintiff,

v.

CHECKMATE.COM, INC.,

Defendant.

Civil Action No. 5:24-cv-00337-TES

**DEFENDANT’S CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

Defendant Checkmate.com, Inc. (“Defendant”), by and through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 7.1 and LR 87, of the Civil Local Rules for the Middle District of Georgia, hereby submits Defendant’s Certificate of Interested Persons and Corporate Disclosure Statement.

(1) The undersigned counsel of record for Defendant to this action certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

- Plaintiff: James Thiele
- Defendant: Checkmate.com, Inc.
- Tiger Global Private Investment Partners X, LP, is a private equity fund that owns more than 10% of Checkmate.com, Inc.’s stock.

- Itsacheckmate.com Services India Private Limited: Checkmate.com, Inc.'s is a private subsidiary company of Checkmate.com, Inc. created and residing in India.

Defendant Checkmate.com, Inc. is incorporated in Delaware with its principal place of business in New York. Defendant states that Tiger Global Private Investment Partners X, LP, is a private equity fund that owns more than 10% of Checkmate.com, Inc.'s stock.

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

Counsel for Plaintiff:

Justin M. Scott  
Elaine Woo  
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125 Clairemont Avenue  
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Counsel for Defendant:

Bradley E. Strawn  
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Atlanta, GA 30326.1127

Respectfully submitted this 20th day of November 2024.

*/s/ Bradley E. Strawn*

---

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Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of November 2024, the foregoing was filed electronically through the ECF system, is available for viewing and downloading from the ECF system and will be sent electronically to the registered participants identified on the Notice of Electronic Filings, including Plaintiff's counsel of record as follows:

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*Attorneys for Plaintiff*

/s/ *Bradley E. Strawn*

\_\_\_\_\_  
Bradley E. Strawn  
Attorney for Defendant



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## Checkmate Completes \$3 Million Series A



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Checkmate has a fresh \$3 million in the bank that will go toward a deeper technology bench but also help expand the company's big differentiator in its competitive set: taking on the third-party headache.

"We want to create a platform that integrates all the online order platforms in a very easy way to all the different point of sale (POS) providers, but we don't just want to create the tech platform," said founder and CEO Vishal Agarwal. "We want a tech platform that's backed by customer service."

Agarwal said as the company has grown, support infrastructure has become especially important as third-party services change how they integrate with restaurant and POS brands.

He said it's become a key feature for both large and small companies. Large networks, like Checkmate's partner Five Guys, just want a clear idea of who to call when something goes wrong when sending an order to the POS or kitchen printer.

"One of the things I learned from Five Guys (is) they said, 'The tech piece is great, but we really love the service component,'" said Agarwal. "For example, if an order does not go through and there's a direct integration, who does the operator call? In our case, we take full responsibility for that."

And with DoorDash and other third-party firms doing their own integrations with large partners, Agarwal said he's focused on just removing the headaches for players.

"For the enterprise customers, they can do the integration, but what about the smaller players in the space, what about the small business space, they don't have the capability to do that. When we are doing the integrations, we are working on it with that very clear mindset that we have to work with anyone of any size or any scale," said Agarwal.

### **Tiger Global's two deals**

That goal for a frictionless digital ordering and delivery experience meant a successful series A round, lead by Tiger Global, which has been active in the space. The global investor also led a Series F round for Instacart just three days later. Tiger is watching for further integrations, and the funding will empower Checkmate to push further into the POS market. Currently, Checkmate covers nine of the most popular POS platforms, but will be adding five more this month and will accelerate that work with more engineers as well as a deeper support staff. Given that there are as many as 120 POS brands and major variants, there's a lot of white space.

Agarwal said that white space and the interest in Checkmate has changed his idea of an end game for the company.

"If you had asked me a year ago, I'd say, 'Yeah I think we'll probably get acquired by a POS or third-party company.' But given the interest we've seen, I truly believe we have a space of our own, we don't need to find a home; we can create our own home," said Agarwal.

And he's quite at home fixing the issues across the industry from accounting, menu management, calculating profits and all the other issues that pop up when looking at the industry "holistically."

"The delivery space is growing so rapidly that nobody has time to fix the problems that are being faced by these operators, they're all focused on the land grab. And the POS providers don't have time to keep up, so there's a basic disconnect that's happening. So we think we're uniquely positioned to solve these problems that are being ignored or overlooked," said Agarwal. "We're loving the problems this industry is throwing out."

**Related Posts:**

- 1. **Checkmate Steps Out With a New Identity and Expanded Ordering Solutions**
- 2. **ItsaCheckmate Founder: In Turbulent Times, 'We're the plane that has landed'**
- 3. **ItsaCheckmate Dives into Details of Inspire Brands Investment**
- 4. **ItsaCheckmate Expands Platform with Open Tender Acquisition**

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## Checkmate Secures \$10 Million in Series B Funding

OCT 23 2024

News

Share:

Checkmate, a leading provider of unified ordering solutions for enterprise restaurants, announced that it secured \$10 million in Series B funding, led by Tiger Global. The round will enable Checkmate to accelerate the adoption of its voice AI and kiosk technologies across the industry and deliver the custom experience brands need. Checkmate has already developed world-class expertise in integrating digital orders into restaurant point-of-sale (POS) systems. This foundation serves as a critical advantage in entering these new business segments.

Checkmate offers best-in-class phone ordering and drive-thru AI solutions to some of the country's largest brands, all seamlessly integrated with their POS. The core business is profitable, and this additional round was raised primarily to bring these breakthrough technologies to mid-market and enterprise brands.

"With this investment, we're doubling down on our development of the technologies that are helping restaurants scale their operations, grow digital revenue, and improve efficiency," said Vishal Agarwal, Founder and CEO of Checkmate. "We are at the forefront of bringing voice AI to the restaurant space, given our existing network of customers and POS integrations. With Tiger Global's support, we will continue leading the charge in transforming the restaurant experience."

Securing Checkmate's Series B round underscores the company's ability to provide technology to restaurant brands at scale efficiently. With restaurant brands under pressure to meet the demands of digital-savvy customers, Checkmate empowers enterprises to launch unique ordering experiences, recapture lost revenue, and stay ahead of market trends. The company's solutions offer an unparalleled level of customization and adaptability, ensuring restaurants are prepared for whatever the future holds.